

Feb. 26, 2016

RespectAbility – Public Comments – Utah Unified State Plan

RespectAbility is pleased to submit the following comments regarding the current draft of the State of Utah’s Unified State Plan as required under Section 102 of the Workforce Innovation and Opportunity Act (WIOA). We are pleased to have this opportunity to offer our comments, raise our questions, and provide our suggestions about the content of the state plan.

Utah has made significant strides in promoting employment opportunities under Governor Gary Herbert, consistently ranking in the top 10 states with the highest disability employment rates. We have watched with great interest as partnerships have grown between your state’s workforce system, the Utah State Office of Rehabilitation (USOR), the Division of Services for People with Disabilities, and the Division of Substance Abuse and Mental Health. Thanks to WIOA, your state has the opportunity to build on those partnerships and to innovate around ways to continue improving outcomes in terms of competitive, integrated employment for people with disabilities. **According to Census data from 2014, Utah ranks 7th in the country in terms of the state’s employment rate of people with disabilities. Of the 148,038 working age Utahans with disabilities, fully 44% of them are employed.**

At the same time, however, there are approximately 12,500 youth with disabilities between the ages of 16 and 20. Each year a quarter of them will age out of the school system with high hopes for success. A lot of your success with WIOA will be linked to how each cohort of young adults to transition into the workforce.

To help the states succeed in this [process we developed a resource called the Disability Employment First Planning Tool](#). This document details best practices and effective models. This toolkit contains models that are proven to work, be cost effective to implement, and be successful. **Likewise, we are also seeing pockets of excellence around innovative youth programs designed to address disability employment in [Georgia](#), [Nevada](#), and [Kentucky](#).**

Many of the critical issues that we raise in our comments concern the need for a disability lens on the overall work of Utah’s workforce system and the need to better align programs. The Utah WIOA State Plan has many strong points. It creates a good strategy and system for vital improvements for Utah’s workforce system and its ability to serve people with barriers to work, employers, and taxpayers alike. This draft plan will capitalize on the partnerships Utah has developed to empower people with disabilities to gain employment. The high expectations, pre-employment pipeline, commitment to program assessment, and partnerships between government agencies will go a long way to sustaining success.

However, no plan is perfect. Upon reviewing the current draft of the state plan there remain a few areas where improvements can be made to achieve the best results possible. **Our public comments on Utah’s WIOA State Plan are structured around those points where greater clarity, precision, and data are needed to ensure that people with disabilities will be better equipped to pursue the American Dream.**

1. Performance Metrics and Program Assessment: Ensure that the best data is included in Utah's Unified State Plan and is used as performance metrics moving forward, including the Labor Force Participation Rates of people with disabilities v. those without disabilities

Achieving success, especially through the implementation of WIOA, will very much depend on having access to the right data to drive the decision making process. We commend Utah's Plan for understanding the importance of utilizing data in its analyses. In furtherance of this, we highly recommend that all program analysis and evaluation be amended to include specific detail on one of the most important data points about the economic situation of the disability community. **It is absolutely critical that Utah's workforce system include the labor force participation rates (LFPRs) of people with disabilities both in their performance metrics and on their state dashboards.** On Page 10, there is a section titled "Labor Force Participation." This must include people with disabilities. People who are not actively looking for work are being excluded from the plan's analysis of the state economy. These rates are the critical lens that is needed to bring clarity to the issue of employment for people with disabilities.

Compared to other states, Utah has one of the smallest gaps in Labor Force Participation Rates between people with and without disabilities. While there is only a 33.5 point gap in the LFPR, more can be done quickly to bring even more people with disabilities into the workforce. Closing the remaining gap will require the focused energy and effort of your state's workforce system. We commend you for your hard work but we want to help your state to keep moving in the right direction. With more focused work, Utah can be an example to the rest of the country of the value people with disabilities bring to the workforce.

[As an example of the data that is needed, we are including a link to the presentation our organization has compiled about employment for Utahans with disabilities.](#) This compilation contains information derived from the Census Bureau's American Community Survey that should be valuable to the WIOA work being done in Utah. As such, we have several further recommendations regarding your Unified State Plan.

First and foremost, concerns the importance of having the right data for your state's decision makers. We know from page 37 of your State Plan that "DWS, USOR, Adult Education, the Utah Data Alliance (UDA), UCAT, and USHE" are collaborating to "collect and analyze data to produce required state and federal reports." As such, we have a specific recommendation to make to this working group. **We recommend that your state include the Labor Force Participation Rates of Utahans with disabilities and decreasing the gap in LFPR between people with and without disabilities as a performance metric for assessing WIOA outcomes in Utah.** Utah already has a solid baseline of data on disability and employment in your state. Any improvements will reflect your state's WIOA efforts.

However, there is one caution we would like to add. As we said previously, unemployment statistics only include people who are actively seeking work. Counter intuitive though it may be, a minor uptick in the unemployment rate might actually be a sign that more people with disabilities are trying to get into the workforce.

Second, because Utah is 7th in the nation in terms of the employment rate for people with disabilities, it is highly illustrative to look at the experience of those with disabilities who are succeeding in the world of work. **From the data, we find that fully 47.1% of the 8,400 Utahans who are blind or have vision loss are employed as are 60.6% of the 18,800 with hearing differences. Even in the cognitive category, we see Utah above the national average with 29.9% of their 17,700 people with intellectual or developmental disabilities employed.** While we are pleased to see these higher-than-average outcomes, we hope that Utah will figure

out what workforce solutions can empower more people through the independence that employment provides. While our organization works across the wide spectrum of disability types, we would encourage Utah to look closely at ways to improve outcomes for Utahans with intellectual or developmental disabilities. **For this population, there will be a considerable return on investment if Utah’s workforce system expands successful school to work transition programs such as Project SEARCH.** Despite the potential successes, your State Plan omits any discussion of this type of cost-effective model. In fact, it is model well suited to meeting the growing talent needs of Utah’s economy. We have more to say on how to address disability as a part of the sector strategy process later in our public comments.

2. Make busting stigmas, myths, and misconceptions a key part of Utah’s workforce strategy:

Low expectations and misconceptions are critical barriers to employment for people with disabilities. [A Princeton study shows that while people with disabilities are seen as warm, they are not seen as competent.](#) Similarly, [a study published by Cornell Hospitality Quarterly found that companies share a concern that people with disabilities cannot adequately do the work required of their employees.](#) **We therefore recommend that Utah’s Unified State Plan be amended to include a comprehensive proactive communications/public relations strategy for reducing such stigmas.** Indeed, we know that other groups of Utahans with barriers to work also face stigmas, especially those leaving the corrections system.

While this type of recommendation might seem to beyond the strictures and requirements of the Workforce Innovation and Opportunity Act as written, it is however consonant with goals set by the Unified State Plan itself. **One of Utah’s goals, as listed on page 5, is to focus on populations with barriers to employment. This is an excellent start, but it’s important to recognize what these obstacles are and that they are not limited to the person’s specific limitations created by their disability. These barriers also include the stereotypes and stigmas they face.** Such an effort matches very well with the work being done through the Utah Governor’s Committee on Employment of People with Disabilities mentioned on page 99 of the State Plan. This Committee could very easily be the focal point for this stigma busting effort.

One of the necessary elements of leading such an effort to have key state leaders who care about employment for people with disabilities and can bring media attention to the value that employees with disabilities possess. Governor Gary Herbert has champion employment for people with disabilities in the past. He supported Governor Markell’s efforts around the *Better Bottom Line Initiative*. As the [Chair of the National Governors Association \(NGA\) for 2015-2016](#), Governor is shining a light on what state leaders can achieve and the innovative solutions they can develop. A great example of his leadership was the [8th Annual Governor’s Economic Summit in 2014. Highlighted at the Summit was “what some may say is the world’s largest emerging market – those with disability” and “top companies are benefiting from the impact of talented disabled professionals.”](#) More events of this type should be done in the immediate future. One of the great things about this show was the opportunity for Richard Marriott, Chairman of the Board of Host Hotels, to be a featured speaker. [The Marriott Foundation](#) and [the Bridges from School to Work program](#) are incredibly efforts doing great work to empower more Americans with disabilities through the employment.

There are three types of messages and audiences that are needed to expand employment for people with disabilities and reduce the stigmatization and stereotyping they face. USOR’s Business Relations Team can be very effective in assisting this campaign. Serious communications campaigns are needed to target the following three areas:

- A. CEOs/business leaders need to understand the value proposition/business case for why they should focus on putting people with disabilities into their talent pipelines.** This is best done through business-to-business success stories. Those businesses need to share their success stories and to talk about how people with disabilities can be extremely capable and loyal workers. People with disabilities can succeed in hotels, healthcare, tend our parks and facilities, assist aging seniors, or are talented computer software engineers. CEOs and business leaders need to know that people with disabilities can be the some of the best people to get a job done. Utah clearly values its many “all-encompassing partnerships”, as noted on page 41. These partnerships can be very valuable in producing an effective PR campaign.
- B. Human resources professionals and on-the-ground supervisors need to understand that hiring people with disabilities is generally easy and inexpensive, and that any costs incurred are more than offset from increased loyalty.** Hiring managers and supervisors are key implementers who can turn policy and business goals into action at the ground level. However, studies show that many of them are afraid of what they don’t know about people with disabilities. They are afraid of potential legal action, costs, or other failures. For them, they need supports that will empower them to overcome their own fears and to excel at recruiting, hiring, supervising or working with colleagues with disabilities. Utah’s VR staff and community agencies can fully support human resources professionals and managers in dealing with their own specific fears and stigmas surrounding hiring people with disabilities. Moreover, online and in-person training is readily available to help from a variety of sources. RespectAbility has online webinars, as does [ASKJAN.org](#), [USDOL](#) and others. [Partners like the Poses Family Foundation Workplace Initiative](#) can provide training to the workforce staff and volunteers systems-wide as well as to community agencies in supporting companies through messaging efforts related to fear and stigma. [The National Organization on Disability](#) and [the U.S. Business Leadership Network](#) also offer strong resources.
- C. People with disabilities and their families need high expectations. From the time of diagnosis, setting high expectations is critical. Utah’s new workforce policies need to be supported by a PR campaign that will inspire Utahans with disabilities to set high expectations for themselves.** For example, Virgin Airways founder Sir [Richard Branson](#) and finance wizard [Charles Schwab](#) are dyslexic. Scientist Stephen Hawking and multi-billionaire businessman Sheldon Adelson, like Gov. Greg Abbott of Texas and President Franklin D. Roosevelt before them, are wheelchair/mobility device users. The CEO of Wynn Casinos, Steve Wynn, is legally blind. Arthur Young, co-founder of EY (formerly Ernst & Young) was deaf. As much as we raise the example of national leaders with disabilities, showcasing successful Utahans with disabilities is also critical. [A great example comes from Governor Herbert’s own Cabinet officer. Kristen Cox, who was once the director of the Department of Workforce Services and is now the director of the Governor’s budget office, could be named as role model for others to follow.](#) Success sells success and that is something the workforce system should do in an intentional manner.

We live in a world where perceptions are shaped at lightning speed by social media, entertainment and news. It can be hard to distinguish fact from fiction. Any campaign needs a multilayered approach in order to change the narrative around workers with disabilities so that

they are seen for the abilities that they bring to the table. Social media certainly has a role to play in this effort.

As an example of the power and the value of making businesses care for hiring people with disabilities, we offer Utah our insights gained from our [#RespectTheAbility campaign](#). #RespectTheAbility is a social media campaign focused on how hiring people with disabilities can make organizations stronger and more successful. The campaign highlights the benefits to employers that look beyond the disability and imagine the possibility when hiring talented employees with disabilities. Our profiles of diverse employers such as EY, AT&T, and Kwik Trip, which can be found on our website, offer insight in how to implement such a multilayered approach.

3. Strong Sector Strategies- The need for strategic alignment of workforce development and economic development to expand employment for people with disabilities:

As required by WIOA Sec. 102(b)(1)(A) Utah's state plan must and does include a detailed analysis of the economic sectors of the state economy that are growing and are forecasted to grow in the future. The success of WIOA depends on being an employer-driven paradigm shift. **Expanding opportunities for people with barriers to employment, such as those with disabilities, requires strong partnerships with employers in those sectors that are rapidly expanding.** The strategic goals outlined in the Unified State Plan make it clear that Utah has taken that commitment very seriously.

We know from page 12 of the current draft of the Unified State Plan that "58% of all Utah occupations are low-wage and do not require extensive education." We would offer the perspective that the untapped potential of Utahans with disabilities is so great that a full-spectrum, all-of-the-above-and-more approach is needed. For far too long, people with disabilities have faced prejudices and stigmas that have trapped those that do work into the "Three F's" of "Food, Flowers, and Filth." As such, we need to look at ways to create pathways for people with a range of disabilities to pursue a diverse range of careers.

The current draft of the Unified State Plan does a very good job of assessing those industries that help drive Utah's economy as well as the emerging career fields which will be critical in years to come. On page 17, included in the list of emerging industries are "Retail Trade", various forms of "Healthcare", and many other industries where people with disabilities excel. **The projected growth in these sectors offers a great opportunity for focused sector strategies to improve employment outcomes among people with disabilities in Utah. We submit that these are job sectors where people with disabilities can excel and benefit their employer's bottom line.**

Millions of dollars are lost each year due to employee turnover. [For all jobs earning less than \\$50,000 per year, the average cost of replacing one employee is between \\$6,000 and \\$20,000.](#) Research shows that employees with disabilities, when their interests and abilities are aligned with the needs of employers, are more productive and loyal than their non-disabled peers. Company records show that even when the relatively more expensive accommodations were factored in, the overall costs of disability accommodations were far outweighed by the low turnover rates and better tenures of the employees with disabilities.

People with disabilities represent an untapped labor resource that, with the right training and supports, can meet the diverse talent needs of Utah's major sectors and the sectors that are rapidly growing. Below, we offer our specific ideas on how to implement such efforts:

A. Health Care and Social Services

As displayed on page 17 of the Unified State Plan, about one-third of the emerging industries fall under the Healthcare “Major Industry.” This trend is both a challenge and an opportunity. It is a challenge in that employers in the health care sector have talent needs that are only going to grow in the years ahead as Baby Boomers age. It is an opportunity to train and prepare young people, especially those with disabilities, to go into a dynamic career field. **People with disabilities can and should be part of the solution to this critical demand in the labor market.** To quote [a 2014 report from the Office of Disability Employment Policy \(ODEP\)](#), “[people with disabilities] not only represent an untapped talent pool, but also offer significant value and insight” in the field of healthcare. Indeed, it is important for healthcare institutions to reflect their customers, and people with disabilities interface more with the healthcare system. There are numerous examples of young people with disabilities doing incredible work in the fields of healthcare, elder care, and in assisted living. We provide many examples on our website. **Employers working in health and elder care can greatly benefit from the loyalty, dedication, and retention rates of employees with disabilities.**

The employer driven, school to work transition program embodied by Project Search has achieved incredible results preparing youth with a wide range of disabilities for career in healthcare, elder care, and other related fields. As such, we were disappointed to see that the current draft of Utah’s Unified State Plan does not discuss this model as a means of meeting Utah’s growing talent needs in the field of healthcare. We recommend this cost-effective model because of the successes it has achieved in other states. Nationally, each year approximately 2,700 young people, spread out in 45 states, do a nine-month, school-to-work program that takes place entirely at the workplace. This innovative, business-led model features total workplace immersion, which facilitates a seamless combination of classroom instruction, career exploration, and worksite-based training and support. Project SEARCH has been tremendously successful. [For example, the first longitudinal study of the program, which was conducted in upstate New York, found “a 68% success rate in transitioning students from high school into competitive employment” and “Project SEARCH sites...have an impressive 83% success rate overall.”](#)

Incorporating Project Search into the overall state plan will help employ people with disabilities and bolster the already strong and the rapidly growing industrial sectors in Utah, including the Health Care and Services sector.

B. Science, Tech, Engineering and Mathematics (STEM) and The Autism Advantage

Beyond healthcare, there are other sectors where with the right preparation and education, Utahans with disabilities can be incredibly successful. In terms of empowering people with disabilities, we would encourage Utah’s workforce system to look very closely at the key economic clusters discussed in the Unified State Plan. On page 15 of the Plan, those clusters are listed as being “Information Technology, Aerospace, Life Sciences, Finance, Energy and Natural Resources, and Outdoor Products.” Together, they account for “15 percent of Utah’s labor force.” As such, it is imperative that people with disabilities be prepared for dynamic careers in those fields.

Of particular note are the sectors of IT and Aerospace. **As has been documented in many cases, there can be an “Autism Advantage” in the STEM field. Indeed, some people on the autism spectrum can have the very best skills in science, math and engineering.** Microsoft, SAP, and Specialisterne have committed themselves to “provide employment

opportunities for people on the autism spectrum in roles such as software testers, programmers, system administrators, and data quality assurance specialists.” The Israeli Defense Forces recruits and trains their citizens on the autism spectrum for work in their elite intelligence unit. [As Carol Glazer said, writing earlier this year in *Huffington Post*, “America is already lagging when it comes to STEM-skilled workers. The U.S. will have more than 1.2 million job openings in STEM fields by 2018.”](#)

Federal contractors and other employers have huge demands for STEM-qualified talents. However, many schools place their best supports for students with disabilities in schools that do not have strong STEM training. This is a huge loss as people on the Autism Spectrum, for example, can have the very best skills in science, math and engineering. Governor Otter can use his excellent leadership to lead the partnerships with companies to employ more people on the autism spectrum. **This issue of STEM and access for students with disabilities is a natural point of partnership between the workforce system and the educational system. That work needs to start young, be matched with high expectations for success, and work to ensure people with disabilities have the chance to become future scientists, engineers, and mathematicians.** This will take partnerships with early childhood interventions, schools, community colleges and universities.

[Partnerships should be created with federal contractors who have Section 503 requirements and talent shortages.](#) This would be a great gateway for people with disabilities to enter the workforce.

C. High Turnover Jobs: Accommodations/hotels, Distribution/Supply chain/Retail

Millions of dollars are lost each year in the United States due to employee turnover. [For all jobs earning less than \\$50,000 per year, the average cost of replacing one employee is between \\$6,000 and \\$20,000.](#) Jobs in accommodations/hotels, retail, and distribution are great for people with disabilities and Project Search is a great resource for job placement in this sector especially. These jobs also often require the least skill and education. This is good for people with disabilities, and good news for Utah. Research shows that employees with disabilities, when their interests and abilities are aligned with the needs of employers, are **even more productive and loyal (higher retention rates)** than their non-disabled peers. Company records show that even when the relatively more expensive accommodations were factored in, the overall costs of disability accommodations were far outweighed by the low turnover rates and better tenures of the employees with disabilities.

A great example of an employment sector where employees with disabilities can be tremendously successful is the hospitality industry. Accommodations and food service are extremely high turnover jobs and numerous studies show that people with disabilities can be outstanding in those fields and have significantly higher employer loyalty.

An outstanding example of the type of work needed is found in Missouri. As part of the Poses Family Foundation’s Workplace Initiative, a coalition of employment service providers has launched a successful training and placement program with the hospitality sector in St. Louis. This training runs for up to 12 weeks, and takes place on site at the hotel; all participants are paid by the hotel for the duration of training. Since the summer of 2015, two cohorts of trainees have completed training at the Hyatt Regency. Trainees have gone on to permanent employment at the Hyatt and other hotel partners in a range of departments—culinary; auditing; and customer service. This type of training and Poses’ Workplace Initiative could easily be part of your overall Sector Strategies.

[Likewise, in other states, hotels and other hospitality employers have found Project SEARCH to be an amazing source of talent. The work done by Embassy Suites and David Scott in Omaha, Nebraska offers valuable lessons that can enable Utah to improve employment outcomes for people with disabilities.](#) Utah's State Board, along with other components of the workforce system, should connect with employers in the hospitality sector to begin figuring out how to benefit from these models.

Another sector with high turnover and big potential are distribution/supply chains. Many companies, including [UPS](#), [Wal-Mart](#), and [OfficeMax](#) have proven records of success. Walgreens has demonstrated that workers with disabilities in their distribution centers are as productive, are safer, and have higher job retention rates when compared to peers without disabilities. These efforts have taken the logistics sector by storm with Lowe's, OfficeMax, Pepsi, P&G, and other companies all launching their own successful disability hiring initiatives. As reported by the National Organization on Disability, "[Lowe's hired more than 150 new workers with disabilities in the first year, and an additional 250 workers in the following 18-month period.](#)" They can be outstanding partners for disability employment as these industries suffer from high turnover rates and people with disabilities are proven to have significantly higher retention rates. It is important to identify more specific opportunities with employers and to cite them in the plan, as well as the criteria by which to continue and to expand such partnerships in the future.

D. Jobs with state government and state contracting can also be sources of opportunity

While the focus of our comments on Utah's Unified State Plan have been around aligning the workforce system to create opportunities for Utahans with disabilities in the private sector, public sector employment should not be neglected. We know that there has been a concerted effort to ensure a leaner, more efficient state government in Utah. However, in the years ahead, the workforce of Utah's state government is likely to be impacted by the cresting wave of Baby Boomers retiring just as other sectors are being shaken. [We know that previous Administration back in 2007 committed Utah to become a "model employer of qualified people with disabilities."](#) The fact that Utah's budget director is a key member of the Herbert Administration and just happens to be blind shows that Utah has made an effort to build an inclusive state government that reflects the people it serves.

In the years ahead, as more Baby Boomers retire from jobs in state government, we encourage you to look at ways to recruit people with disabilities as a solution to this coming challenge. There reasons for doing so were first discussed in Governor Markell's *Better Bottom Line* Initiative and later in RespectAbility's *Disability Employment First Planning Toolkit*. In Governor Markell's own words, "[One key action is to set a state goal for hiring people with disabilities through an executive order and hold agencies accountable for achieving that goal.](#)"

Utah should explore the feasibility of reviewing hiring policies for recruiting people with disabilities for jobs in state government and perhaps Director Cox could lead such an effort in the coming months ahead. Additionally, the state could look at ways of expanding state contracting obligations similar to the model we see in Section 503 for federal contractors. [Likewise, we are also seeing great success with governmental hiring of people with disabilities at the local level in Montgomery County Maryland.](#)

The untapped potential of Utahans with disabilities is such that a full-spectrum, all-of-the-above-and-more approach is needed. While our priority is on seeing the talents of people with

disabilities channeled into the private sector, employment opportunities in the public sectors shouldn't be overlooked as part of the state's overall workforce strategy.

4. FEDERAL CONTRACTORS: Section 503 of the Rehabilitation Act and Federal Contractors offer Utah the chance to innovate, collaborate, and expand opportunity:

While there is a great deal of data and detail in the current draft of Utah's Unified State Plan, there is also an omission. **The current draft of the Unified State Plan does not, at any point, discuss the opportunities created by Section 503 of the Rehabilitation Act.** [The new 7% utilization goal set for companies to recruit, hire, and retain qualified individuals with disabilities in all job categories is a huge opportunity to innovate.](#)

Utah needs to respond to the opportunity created by Section 503 with a strategy focused on competitive advantage, not just compliance. These regulations and requirements entail far more than just new rules for businesses to play by. **Section 503 is an opportunity that could potentially have a broad impact on the employer engagement work of the entire workforce system.** The companies who must comply with Section 503 have an opportunity to teach companies not impacted by the regulations how to effectively employ, engage, and retain workers or customers with disabilities.

Utah's Business Relations Team can help find apprenticeship and internship opportunities should be forged with large federal contractors who are looking for talent. It will also be vital to have transportation solutions for workers with disabilities who are ready to work for federal contractors and other employers. **Specific companies that should be included in your outreach efforts include URS Corp., Balfour Beatty/DPR/Big-D A Joint Venture, Northrop Grumman Corp, Alliant Techsystems INC., and L-3 Communications Holdings.** [Northrop Grumman in particular is working very hard to make disability a key element of their diversity strategies. As discussed in the section on stigma, for their efforts, they earned a top score of 100 points on the 2014 Disability Equality Index. More detailed information regarding federal contracts in Utah can be found here.](#)

5. Standing up an affiliate chapter of the US Business Leadership Network could a be critical tool for effectively engaging employers and reaching the right business audience:

As we stated previously about communicating the business case for hiring people with disabilities, effective employer engagement is a necessary component of achieving improved employment outcomes. One of the most effective means of carrying that message forward is to have a network of engaged businesses whose bottom line has benefitted from the talents of employees with disabilities. Business to business communication can help tear down the misconceptions and stigmas which are barriers to employment.

[Currently, Utah does not have an affiliate chapter of the US Business Leadership Network \(USBLN\).](#) This limits the flexibility and capability of Montana to engage employers around hiring people with disabilities. As such, we highly recommend that the appropriate staff both in the workforce system and VR work with the employer partners to formalize their intersections through the establishment of an affiliate chapter. Establishing a BLN Chapter in Utah would help to organize the "knowledge of community outreach, recruiting and interviewing, the accommodation process and barriers" needed to achieve improved outcomes. From previous conversations that we have had with staff from the Utah State of Office of Rehabilitation, we know your state has a core group of businesses that collaborate in order to place VR clients into

jobs. These business partners would certainly benefit from tapping into the national structure of the USBLN and their resources.

Further, Utah borders Wyoming, which possesses one of the most effective, engaged, and active affiliate chapters in the country. The Wyoming BLN, despite the challenges of a largely rural population and limited resources, has been achieving outstanding employment outcomes. We would be happy to provide Utah's WIOA team with an introduction to Lynn Kirkbride the USBLN's Director of Affiliate Relations. She is an incredible asset and has extensive experience around overcoming barriers to employment. Her email is lynn@usbln.org and she can be reached by phone at (307) 631-0894. Her efforts, and those of the Wyoming BLN, offer profound insights into how to effectively engage employers around the business case for hiring people with disabilities.

6. Overcome the gap between disability services and career services in Post-Secondary Education:

There is a fundamental disconnect in most post-secondary education programs between disability services and careers. This is not a new issue and it is one that other organizations have raised in the past. However, with the priorities put into place by the implementation of WIOA, there is a historic opportunity to bridge this gap and to improve career and technical education for young people with and without differences. As formulated by the National Organization on Disability, at most educational institutions, "the career services office, which assists students in preparing for" the workforce ["lack a strong—or any—connection to the office of disabled student services, which ensures proper accessibility and accommodations on campus for students with disabilities."](#)

The result is a price we pay as a society is twofold. First, it costs employers who are unable to find qualified job candidates. Second, it costs students with disabilities who may be able to graduate with a degree thanks to accommodations but will go on to struggle to succeed in the working world. Nationally, there are 1.3 million young Americans ages 16-20 with disabilities. [They have high expectations to go into the workforce but currently only 53% of college graduates with disabilities are employed](#) as opposed to 84% of graduates with no disability. In total, only about 7% of people with disabilities will earn a college degree and less than half of the 2.3 million with a degree are employed.

[Due to the mandate created by Section 503 of the Rehabilitation Act, federal contractors now have a utilization goal to make sure that 7% of their employees across all job groups be qualified people with disabilities.](#) This regulation is actually a huge opportunity because companies are actively looking to hire recent graduates with disabilities. The first place for new recruits is college and campus recruiting. Utah has the chance to demonstrate to business that college students with disabilities are on campuses and that they should be actively targeting those with disabilities just as they do all other diversity recruiting on college campuses.

We are pleased to see that USOR has a Transition Coordinator, as described on page 95. This Coordinator would do well to remember the importance of getting students with disabilities connected to career services and prepared for the workplace early. While the statistics cited above are national ones, they have bearing on the work that needs to be done through your community college system. Beyond just WIOA, community colleges are uniquely

positioned to innovate in order to expand opportunity. Community colleges are very closely connected to the working world and the specific training requirements of employers.

7. Ensure that Apprenticeship Programs are Fully Accessible and Actively Recruiting Young People with Disabilities, Especially with Government Contractors

One of the often-neglected opportunities for people with disabilities is training opportunities offered by apprenticeship programs. We are pleased to see that Utah values apprenticeship programs, including them in its “Focus on Education and Training” strategy, as well as in its efforts to form and maintain partnerships with employers. This is critical work and it is work that needs to be viewed through the lens of disability.

As Utah looks to improve these programs, we highly recommend that the workforce system seriously look at ways to make apprenticeships accessible to people with disabilities. At the federal level, the Office of Disability Employment Policy has worked hard to generate resources which can open up these exciting programs to “youth and young adults with a full range of disabilities.” The regulations related to apprenticeship which have recently come out of the Department of Labor provide states the flexibility they need to refine and design training programs that maximally inclusive of people with diverse talents. [We encourage you to invest time and energy to understand the best practices contained in ODEP’s apprenticeship toolkit. Further, we would also highly recommend that VR staff connect and collaborate with the Federal officer responsible for apprenticeship programs in Utah.](#) Such innovative partnerships and improved accessibility are essential elements of realization the full promise of WIOA for people with disabilities.

Further, we would suggest that there is a critical opportunity to look at Section 503 and federal contractors as a partner in expanding apprenticeship programs. Funding to cover training costs could be a very attractive selling point for federal contractors looking to meet their 503 requirement. Further, we would also recommend looking at the intersection of apprenticeships and sector strategies. Not only can apprenticeships be set up in traditional fields such as construction, but they can also be incredibly useful in health care and computer jobs. Look at the successes achieved by Project SEARCH at a wide range of employers. As such, we recommend that the workforce system and the State Board investigate how to both open apprenticeship programs to people with disabilities and to create apprenticeship opportunities in new career fields as well.

8. Avoid the Opportunity Costs of Focusing Too Much on One-Stop Centers. Programmatic Accessibility is Critically Important:

Public policy is about the allocation of scarce resources to meet infinite needs. It is vital to invest resources on those points where they can have the greatest effect. One challenge that we have seen in many states’ WIOA plans has been the prioritization of expensive bricks and mortar One-Stops as the primary access point for programs and services under WIOA. Focusing exhaustively on One-Stop Centers, physical infrastructure, and co-locating services comes at the opportunity cost of losing the chance to improve supports and increase outcomes.

The workforce needs of state economies are evolving rapidly thanks to technology and globalization. Investing excessive resources on physical locations at the expense of improving online delivery of workforce services and supports is an example of looking backwards, not forwards. We commend you for including a section on “Accessibility of the One-Stop Delivery System” on page 61. We are encouraged by your efforts. One strategy that we

have seen work is the movement of one-stop services to trained staff with laptops that go to schools, hospitals, and community organizations where they are better able to serve the public. Utah should look into this. These trained staff could reach a large number of people with disabilities and offer a wide range of a career services efficiently and effectively.

9. Prioritize pre-employment training and expand partnerships with VR:

We are very pleased to see the increasing collaboration of agencies on youth transition issues and the emphasis Utah places on job training. As much as we would encourage your state to follow Florida and Wisconsin's example by working hard to develop a number of Project Search sites, this is not the only paradigm that you should follow. The school system, vocational rehabilitation, and local workforce boards can build creative, collaborative partnerships with companies that are leading on disability.

As you embark on your new strong collaborations, we encourage you to explore proven programs employed by companies like Amazon, UPS, and Pepsi. At one of UPS' busiest facilities, there is a training program dedicated to preparing youth with disabilities to succeed. Taking place in Louisville, KY, [The Transitional Learning Center is the result of a partnership between an employer, the school system, and vocational rehabilitation.](#) Pre-training programs are great because they offer the opportunity to train youth with disabilities in the soft skills they need to succeed and provide them with a foundation of work experience. Utah should also look at other models of innovation that are showing great potential to fundamentally improve employment outcomes. To begin with, we would highly recommend that Utah build on its partnerships with non-profit organizations such as the Poses Family Foundation. The fee-for-service initiative USOR has driven, as described on page 95, is the beginning of great work with non-profit organizations. Successful public-private partnerships of the kind seen in Utah and in states are fundamental to improve outcomes. They unite the strengths of USOR with the insights offered by non-profits focused on workforce development. We are encouraged by the work being done here and we look forward to seeing the continuing results of this work.

10. Getting Out the Word on Free and Accessible Services and Resources:

There are many online and in-person resources, both within Utah and on the national-level, to help employers and people with disabilities come together to build success. However, all the stakeholders need to be educated to know that these resources exist, and that they are free and user-friendly. These resources must also all be accessible. **Utah should be careful not to waste money creating online resources that mirror what is offered by ASKJAN.org, the US Department of Labor's Office of Disability Employment,** our organization and others. We offer free toolkits, webinars and training opportunities that Utah can utilize for its own good. We suggest that the state simply puts these resources out there. It's an easy way to make a significant impact at a minimal cost.

Utah's first goal listed in its executive summary on page 2 of the Plan is to "increase access to education, training, and employment – particularly for people with barriers to employment." This goal should include making programs more accessible, both physically and programmatically. In addition to making things more accessible, Utah should get the word out to people that these resources exist and are accessible.

11. Nothing About Us Without Us:

“Nothing About Us without Us” has long been a rallying cry for the one-in-five Americans who have a disability and it has implications for the workforce system. As such, we are very glad to see the inclusion of the Governor’s Committee on Employment for People with Disabilities. Not nearly enough states have such a committee focused on expanding job opportunities and employment outcomes. Its membership offers a multi-pronged approach to implementing and coordinating the best policies for people with disabilities.

Moving forward, we see natural opportunity to push for the inclusion of the voices of members of the disability community in the conversations guiding Utah’s workforce system. As such we highly encourage your state’s *Workforce Development Board* to see about recruiting a self-advocate to speak to the needs of Utahans with disabilities.

12. Transportation is a vital component and it must be addressed directly:

One significant reservation that we have regarding Utah’s Unified State Plan is the very limited attention given to the issue of transportation. This is of critical importance not only for Utahans with disabilities but also other members of low-income communities. **Many people with disabilities do not drive. Others cannot afford private transportation. It is vital to work with public transportation to ensure that there are bus routes to places where there are internships, apprenticeships and other work opportunities for people with disabilities.**

People with disabilities need transportation solutions. Public transportation need not be the only solution. In places where it is not possible to coordinate a bus route, Utah could look at partnering with Uber, Lyft, or other new transportation solutions. For people with disabilities who do drive, such companies as Uber and Lyft can also provide a way to enter into the workforce with flexible hours, so Utah could also look at developing partnerships with these sorts of companies.

Public sector employers and federal contractors who have 503 obligations are key places for apprenticeships and internships and onboarding of talent. It is important for them to play a key role in planning for public transportation as well.

13. Aging workers and those with recently acquired disabilities must be specifically addressed:

Attention should start BEFORE aging workers and those with recently acquired disabilities lose their job due to aging and/or a newly acquired disability. Many people who have been in the workforce for decades find that before full retirement age they cannot keep up with the physical demands of their jobs. It is vital to start working with them BEFORE they lose their jobs. In Iowa, IVRS works with a major employer, Unity Point Hospital to “re-home” employees to other jobs within the same company when good workers can no longer do physical jobs and need a new assignment. They find that Emergency Room nurses, for example, come to a point where they can no longer keep up with the physical demands of that job. They have a department that works to “re-home” talented and valued employees who either age into a disability or acquire a disability through accident or illness. Empowering youth with disabilities to enter the workforce should be your highest priority, but keeping aging workers in the workforce until retirement age is also important. This will take a specific strategy and effort so that you don’t have massive numbers of people going onto disability rolls and out of the workplace prematurely.

14. Strategic Engagement to Build a Mentor System for Customers of the Workforce System:

Government can't and shouldn't do everything. There is a massive role that can be played by volunteers who are willing to help people with barriers to work, including people with disabilities, find and keep jobs. There is a critical, cooperative role for non-profits and faith-based organizations to play. Local workforce development areas, for example, could be encouraged to recruit volunteers from local faith communities or local non-profits. However, much more can and should be done to work with parents of teens and young adults with disabilities, and to create volunteer mentorships for people with disabilities who are looking for work or need supports to stay employed and/or grow their careers.

We are pleased that the Governor's Committee is responsible for the implementation and coordination of Disability Mentoring Day events. Its diverse and experienced members should be a very good resource for developing mentorships between transition age students with disabilities and businesspersons that can aid them in their careers.

15. The disability issues of people involved in the corrections system must be addressed:

The work being done with this population needs to be viewed through the lens of disability. [According to recently published data from the Bureau of Justice Statistics, "An estimated 32% of prisoners and 40% of jail inmates reported having at least one disability." This issue is a serious one and it needs to be addressed at the state level.](#) Frequently people are involved in the criminal justice system because they have disability issues, including learning differences, ADHD, executive function, and mental health issues that went undiagnosed and/or unaddressed through childhood and into the school years.

Given these statistics from the BJS, it is vital that Utah identify how many of the individuals in the corrections system and in the ex-offender pipeline have disabilities. Serving people in the corrections system and ex-offenders is a critical workforce development challenge and one that can only increase when disability is a factor and it is not addressed appropriately. The price paid for ignoring this issue are higher rates of recidivism and greater costs to society. **Assessment tools are needed to identify disability issues as people enter the prison system and supports are needed as they exit the system back into society. Doing so would create opportunities for Utah to address those issues productively and proactively.**

Conclusion:

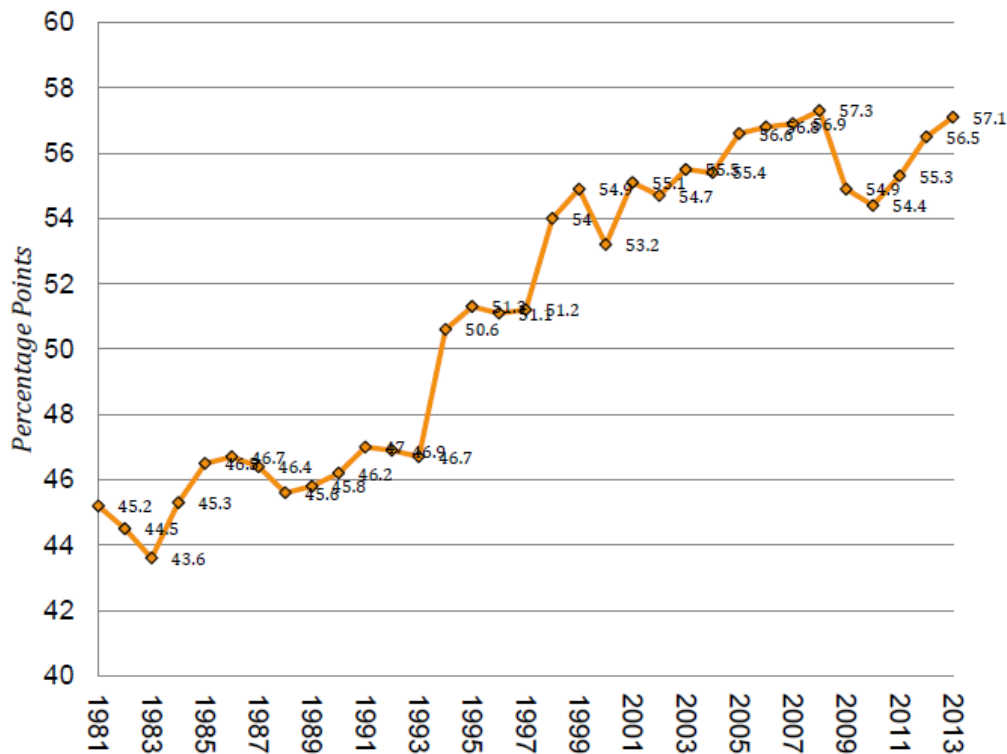
The bottom line is that expanding job opportunities for people with disabilities is beneficial to all. It is good for employers because the loyalty, talent, and skills of workers with disabilities contribute to the employers' bottom line. It is good for the workforce system because improving services and supports for people with disabilities will benefit others with different barriers to employment. It is good for people with disabilities who want the dignity, pride, friendships, independence and income that work provides. And it is good for taxpayers, because it reduces the amount of funding spent on SSDI and other disability programs in the long run.

In all of our work around WIOA, we have emphasized the fact that this new law represents the intersection of hope and history for people with disabilities. Utah's WIOA State Plan demonstrates some of the hard work, dedicated effort, and specific policies needed to realize those hopes. People with disabilities want to pursue the American Dream, just like everyone else. Making sure there are pathways for their talents to meet employer talent needs is a win-win-win for people with disabilities, taxpayers, and businesses alike. We are encouraged by

what we have seen in Utah’s Plan and are excited to see the final product. We are happy to answer any questions you may have. Thank you for your time and consideration.

We have included a chart below which looks at the gap in workforce participation between those with and without disabilities nationally over time. As seen in the chart, as women and minorities have been able to make significant strides in joining the workforce, people with disabilities have not. We know that by maximizing the potential of Utah’s WIOA plan, all of this can continue to change for the better for the people of Utah.

Chart 1 – The gap nationally in workforce participation rates between people with disabilities and their non-disabled peers.



Source for chart is the Disabilities Compendium.

Below are two data tables that provide detailed information ranking the states in terms of employment rates for people with disabilities as well as the employment gap between people with and without disabilities. This has been added to show you where Utah ranks nationally and to showcase several of the data points needed in Utah’s WIOA State Plan.

Table 1 Ranking 50 States by Employment Rates and Employment Gap

Data Source- Column 1: Table 2.1: Employment—Civilians with Disabilities Ages 18 to 64 Years Living in the Community for the United States and States: 2013 from the Annual Disability Statistics Compendium

Data Source-Column 2: Table 2.9: Employment Gap—Civilians Ages 18 to 64 Years Living in the Community for the United States and States, by Disability Status: 2013 from the Annual Disability Statistics Compendium

Link: <http://disabilitycompendium.org/compendium-statistics/employment>

Column 1 Ranking of States by Employment Rate of People with Disabilities			Column 2 Ranking of States by the Employment Gap between People with disabilities and people without disabilities				
#	State	% of PWDs Employed	#	State	% of PWDs Employed	% of People without Disabilities Employed	Employment Gap as a %
1	South Dakota	50.1	1	North Dakota	49.9	82.0	32.1
2	North Dakota	49.9	2	Nevada	40.9	74.3	33.4
3	Iowa	46.5	3	Utah	44.0	77.4	33.5
4	Nebraska	46.0	4	South Dakota	50.1	83.7	33.6
5	Wyoming	45.2	5	Hawaii	42.4	76.6	34.2
6	Minnesota	44.4	6	Alaska	40.8	76.0	35.3
7	Utah	44.0	7	Iowa	46.5	82.2	35.7
8	Hawaii	42.4	8	Wyoming	45.2	81.0	35.9
9	Colorado	41.6	9	Idaho	38.8	75.7	37.0
10	Nevada	40.9	10	Montana	40.5	77.7	37.3
11	Alaska	40.8	11	New Jersey	39.2	76.5	37.3
12	Montana	40.5	12	Texas	38.0	75.3	37.3
13	Connecticut	40.2	13	Colorado	41.6	79.1	37.4
14	New Hampshire	40.0	14	Connecticut	40.2	77.9	37.7
15	Kansas	39.8	15	Nebraska	46.0	83.9	37.9

16	Wisconsin	39.8	16	Washington	37.7	76.0	38.3
17	New Jersey	39.2	17	Minnesota	44.4	82.9	38.5
18	Maryland	39.1	18	Oregon	36.4	74.9	38.5
19	Idaho	38.8	19	California	33.3	72.2	38.9
20	Texas	38.0	20	Maryland	39.1	78.2	39.1
21	Washington	37.7	21	Oklahoma	36.4	75.6	39.2
22	Virginia	37.6	22	Arizona	32.8	72.5	39.7
23	Oklahoma	36.4	23	Kansas	39.8	79.7	39.9
24	Oregon	36.4	24	Illinois	35.7	75.7	40.0
25	Indiana	36.2	25	Virginia	37.6	77.6	40.0
26	Vermont	36.2	26	Louisiana	32.1	72.4	40.3
27	Illinois	35.7	27	New York	33.6	74.0	40.4
28	Delaware	35.6	28	Delaware	35.6	76.3	40.7
29	Massachusetts	35.5	29	Indiana	36.2	77.0	40.7
30	Ohio	34.6	30	New Mexico	30.4	71.2	40.8
31	Pennsylvania	34.5	31	New Hampshire	40.0	81.3	41.3
32	Rhode Island	33.9	32	Wisconsin	39.8	81.1	41.4
33	New York	33.6	33	Pennsylvania	34.5	76.5	42.0
34	California	33.3	34	Ohio	34.6	77.0	42.5
35	Arizona	32.8	35	North Carolina	31.3	74.3	43.0
36	Missouri	32.8	36	Mississippi	27.4	70.4	43.1
37	Maine	32.5	37	Florida	30.1	73.4	43.3
38	Louisiana	32.1	38	Georgia	29.6	73.1	43.5
39	North Carolina	31.3	39	Massachusetts	35.5	79.0	43.5
40	New Mexico	30.4	40	Rhode Island	33.9	77.7	43.8
41	Florida	30.1	41	Alabama	27.3	71.3	44.1
42	Tennessee	29.9	42	Vermont	36.2	80.4	44.2

43	Georgia	29.6	43	Missouri	32.8	77.2	44.4
44	Michigan	29.6	44	Tennessee	29.9	74.4	44.5
45	Arkansas	29.2	45	Arkansas	29.2	73.8	44.6
46	South Carolina	29.0	46	West Virginia	25.6	70.5	44.9
47	Mississippi	27.4	47	Michigan	29.6	74.6	45.0
48	Kentucky	27.3	48	South Carolina	29.0	74.0	45.0
49	Alabama	27.2	49	Kentucky	27.3	74.4	47.1
50	West Virginia	25.6	50	Maine	32.5	79.9	47.4

Table 2

From 2012 to 2013, the employment gap closed by one percentage point or more in 22 states.

The top four states with the greatest reductions (AK, RI, WY, and NH) were small states-- with working-age populations under one million persons. It is hard to make comments about small states, because these statistics are estimates based on state-level samples. Smaller states have smaller samples and thus have a higher degree of year-to-year variability. I am hesitant to read too much into reductions and expansions in the employment gap for small states.

Looking at large states-- with working-age populations over 5 million persons--Illinois (a 2.3 percentage point reduction) and New Jersey (a 1 percentage point reduction) stand out. These are two large industrial states

All of the states that experienced reductions greater than one percentage point also experienced increases in employment rate of people with disabilities, so none of these reductions were due a reduction in the employment rate of people without disabilities.

The state that really stands out is South Carolina, with a 2.3 point reduction, while also having a 1.3 point increase in the employment rate of people without disabilities. The big question is whether we can attribute success, like the success in South Carolina to changes in policy or new innovative approaches to employing people with disabilities.

Working-age population under 1 million
Working-age population over 5 million
Increase in no dis employment

State	2012			2013			Change in Gap		Pop in 2013			Increase in Dis. Emp.	Increase in Non-PWD Emp.
	Dis.	No Dis.	Gap	Dis.	No Dis.	Gap	Pct. Points	Rank	Number	Rank	Size		

AK	39.0	76.3	37.3	47.8	75.2	27.4	-9.9	50	459,776	47	Working-age pop. under 1 million	8.8	-1.1
RI	28.7	77.0	48.3	34.3	76.3	42.0	-6.3	49	668,448	43	Working-age pop. under 1 million	5.6	-0.7
WY	43.9	78.5	34.6	50.7	79.4	28.7	-5.9	48	358,526	50	Working-age pop. under 1 million	6.8	0.9
NH	37.9	80.5	42.6	41.8	80.3	38.5	-4.1	47	842,880	40	Working-age pop. under 1 million	3.9	-0.2
MN	42.1	81.6	39.6	46.0	82.1	36.1	-3.5	46	3,357,171	21		3.9	0.5
NV	35.5	72.2	36.7	39.2	73.1	33.9	-2.8	45	1,719,885	34		3.7	0.9
WI	37.6	79.5	41.9	40.9	80.1	39.2	-2.7	44	3,544,103	20		3.3	0.6
SC	27.0	71.4	44.4	30.7	72.7	41.9	-2.5	42	2,893,842	24		3.7	1.3
NM	33.1	70.4	37.3	35.3	70.1	34.8	-2.5	42	1,243,353	36		2.2	-0.3
IL	33.4	74.6	41.2	36.1	75.0	38.9	-2.3	41	8,010,771	5	Working-age pop. over 5 million	2.7	0.4
IA	42.0	81.4	39.5	44.8	82.1	37.2	-2.3	40	1,868,852	30		2.8	0.7
UT	41.1	77.2	36.1	42.5	76.6	34.1	-2.0	39	1,701,705	35		1.4	-0.6
DE	34.6	75.1	40.6	36.4	75.1	38.7	-1.9	38	565,138	45	Working-age population under 1 million	1.8	0
CO	40.3	77.1	36.8	42.3	77.3	35.0	-1.8	36	3,304,940	22		2.0	0.2
HI	37.3	75.6	38.3	39.1	75.7	36.5	-1.8	36	822,542	42	Working-age population under 1 million	1.8	0.1
NE	43.5	82.2	38.7	45.5	82.6	37.1	-1.6	35	1,125,425	38		2.0	0.4
ND	51.6	83.3	31.7	52.8	83.1	30.2	-1.5	34	451,304	48	Working-age population under 1 million	1.2	-0.2
KS	40.1	78.8	38.7	41.7	79.0	37.3	-1.4	33	1,730,369	33		1.6	0.2
MA	33.0	77.2	44.2	34.9	77.9	42.9	-1.3	31	4,272,843	14		1.9	0.7
OK	34.4	75.1	40.7	35.8	75.2	39.4	-1.3	31	2,295,734	28		1.4	0.1
TN	28.0	73.2	45.2	29.9	74.1	44.1	-1.1	30	3,983,560	16		1.9	0.9
NJ	35.0	74.5	39.5	36.6	75.1	38.5	-1.0	29	5,528,837	11	Working-age pop. over 5	1.6	0.6

											million		
TX	37.0	73.8	36.9	38.7	74.7	36.0	-0.9	28	#####	2	Working-age pop. over 5 million	1.7	0.9
FL	28.9	71.4	42.5	30.5	72.2	41.7	-0.8	27	#####	4	Working-age pop. over 5 million	1.6	0.8
NY	30.9	72.7	41.8	32.2	73.3	41.1	-0.7	26	#####	3	Working-age pop. over 5 million	1.3	0.6
AL	26.8	70.8	44.0	27.1	70.5	43.4	-0.6	25	2,945,466	23		0.3	-0.3
GA	30.3	70.8	40.5	31.5	71.5	40.0	-0.5	22	6,151,890	8	Working-age pop. over 5 million	1.2	0.7
CT	39.7	76.6	36.9	40.0	76.4	36.4	-0.5	22	2,235,695	29		0.3	-0.2
WV	24.3	70.1	45.8	25.3	70.6	45.3	-0.5	22	1,132,703	37		1.0	0.5
WA	35.7	74.3	38.7	36.4	74.7	38.3	-0.4	21	4,339,199	13		0.7	0.4
PA	33.0	75.1	42.1	33.9	75.6	41.7	-0.4	20	7,849,516	6	Working-age pop. over 5 million	0.9	0.5
MT	38.7	76.4	37.7	39.4	76.8	37.4	-0.3	19	616,125	44	Working-age pop. under 1 million	0.7	0.4
MI	27.9	71.7	43.8	29.9	73.4	43.5	-0.3	18	6,096,761	9	Working-age pop. over 5 million	2.0	1.7
MS	26.4	69.6	43.3	26.3	69.4	43.1	-0.2	17	1,790,746	31		-0.1	-0.2
CA	31.8	70.2	38.5	32.7	71.1	38.4	-0.1	15	#####	1	Working-age pop. over 5 million	0.9	0.9
VA	36.3	76.5	40.1	36.9	76.9	40.0	-0.1	15	5,112,923	12	Working-age pop. over 5 million	0.6	0.4
KY	26.2	72.9	46.7	26.9	73.7	46.8	0.1	14	2,687,179	26		0.7	0.8
OH	32.8	75.1	42.2	33.5	75.9	42.4	0.2	13	7,072,114	7	Working-age pop. over 5 million	0.7	0.8
MO	32.2	76.2	44.0	33.0	77.1	44.2	0.2	12	3,666,019	19		0.8	0.9
MD	39.5	77.4	37.9	40.0	78.3	38.2	0.3	11	3,722,201	18		0.5	0.9
IN	33.5	75.5	41.9	33.8	76.0	42.3	0.4	10	4,008,950	15		0.3	0.5

VT	34.3	79.8	45.5	33.3	79.6	46.3	0.8	9	397,726	49	Working-age pop under 1 million	-1.0	-0.2
AZ	34.2	71.0	36.8	33.6	71.3	37.7	0.9	8	3,900,900	17		-0.6	0.3
OR	34.3	72.1	37.8	35.2	73.9	38.8	1.0	7	2,440,752	27		0.9	1.8
NC	30.2	72.2	42.0	30.3	73.5	43.2	1.2	6	6,000,202	10	Working-age pop. over 5 million	0.1	1.3
ID	38.6	74.8	36.2	36.7	75.2	38.5	2.3	5	946,943	39	Working-age pop. under 1 million	-1.9	0.4
ME	33.2	78.1	44.8	31.2	78.8	47.6	2.8	4	825,507	41	Working-age pop. under 1 million	-2.0	0.7
LA	34.4	72.6	38.2	31.3	72.4	41.1	2.9	3	2,825,101	25		-3.1	-0.2
AR	31.4	72.7	41.3	28.2	72.7	44.5	3.2	2	1,759,900	32		-3.2	0
SD	52.0	81.8	29.8	48.1	83.0	34.9	5.1	1	501,769	46	Working-age pop. under 1 million	-3.9	1.2

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